

**Remarks**

Claims 1, 3-10, 12-15 and 17, 18 and 24-29 are pending. New Claims 26-29 are added in this Amendment.

**Amendments**

The claims have been amended to replace "at least one" with "a." Although both terms mean the same thing, all elements are now introduced with the article "a" to avoid any implication that the use of both "a" and "at least one" to introduce different claim elements might somehow suggest "a" was to be construed narrowly as only one, instead of the traditional one or more. Also, subparagraph letters have been deleted from all claims.

Claims 1 and 15 have been amended to cover any kind of interface, not just an API, and to recite Web resources that are each able to make use of the same interface (or interfaces if more than one) in order to access the user's personal repository. Support for these amendments may be found under the section heading Common Interface beginning in the Specification at page 4, line 10.

**Rejections Based On The Combination Of Wood, Johnson And Wang**

Claims 1, 5-8, 13-17 and 24 were rejected under Section 103 as being obvious over Wood (6453127) in view of Johnson (20020152210) and Wang (20030009537). Claims 3, 4, 9, 10, 12 and 18 were rejected under Section 103 as being obvious over Wood, Johnson, Wang and Gopalan (20030076526).

The system of amended Claim 1 includes a Web site operable to cause the Web client to display a portal Web page that includes a plurality of hyperlinks each pointing to a unique Web resource. Each of these web resources can make use of the same interface to access the user's personal repository. Similarly, the method of amended Claim 15 includes the server transmitting to the client a portal Web page that includes information regarding a plurality of different Web resources that are configured to make use of the same interface to access the user's personal repository.

Specifically with regard to Claims 1 and 15, as amended, the Examiner relied on Johnson to supply the interface limitations of original Claims 1 and 15. Johnson teaches a client application program interface (API) configured to access multiple content repositories. Johnson does not teach or even suggest the inverse configuration in which multiple Web resources access one or more of the content repositories through the same API. Wood also does not teach or suggest any such common interface. In Wood, a printer user/client accesses the printer via the Internet through a server/print queue. The file server sends the user/client a user interface for configuring the print job for whichever printer is selected by the user/client. There is nothing in Wood that teaches or suggests multiple printers accessing documents in a user/client's personal repository through a common interface. On the contrary, Wood appears to teach a conventional schema in which the user/client transmits documents to the printer via the Internet through a file server.

The combination of Wood, Johnson and Wang, therefore, fail to teach or suggest this limitation in amended Claims 1 and 15. If the Examiner disagrees, he is respectfully requested to specifically point out *and explain* those passages in Wood and/or Johnson that teach the interface limitation of Claims 1 and 15, as amended.

With regard to all of the independent claims, the combination of Wood, Johnson and Wang is not properly motivated. The Examiner argues it would have been obvious to combine Wood and Johnson because "Johnson's API would enable the user to search, update, display, add and manage content in the user's personal repository", citing to Johnson page 2, paragraph 0022. As noted above, the API in Johnson is configured to access multiple content repositories. Paragraph 0022 in Johnson says only that the API "enables an end user to search, update, display, add, and manage content in a plurality of disparate content repositories using a single, consistent interface." While this may be true, these features of Johnson's API neither suggest nor motivate combining the

Johnson API with the conventional schema of Wood in which the user/client transmits documents to the printer via the Internet through a file server. This lack of suggestion/motivation is particularly apparent when one ignores (as one must) the Applicants' disclosure. Again, if the Examiner disagrees, he is respectfully requested to explain how the fact that Johnson's API "enables an end user to search, update, display, add, and manage content in a plurality of disparate content repositories" somehow suggests the API could or should be used to allow Johnson's printer to access a job store or other repository associated with the user/client.

The Examiner argues it would have been obvious to combine Wood/Johnson with Wang because Wang's portal web page "would allow the user to select a particular device of interest by clicking on the representation of the device", citing to Wang page 8, paragraph 0104. Of course, this is the primary advantage of any Web based portal page -- to allow the user to select one of the links to a web site or other resource displayed on the page. Applicants fail to see how this generalized benefit might somehow be deemed to suggest or motivate using a portal Web page with the printer schema of Wood, in which the user/client transmits documents to the printer via the Internet through a file server, or with the API of Johnson. Indeed, it is not at all apparent how a portal Web page could or should be used in Wood and/or Johnson, particularly if one ignores (as one must) the Applicants' disclosure.

Upon reconsideration, the Examiner is urged to evaluate the invention of each claim as a whole. After all, the question of obviousness under Section 103 is not whether each of the differences between the claimed invention and the prior art would themselves have been obvious, but whether the claimed invention as a whole would have been obvious. MPEP § 2141.02(I) (citing *Stratoflex, Inc. v. Aeroquip Corp.*, 713 F.2d 1530, 218 USPQ 871 (Fed. Cir. 1983) and *Schenck v. Nortron Corp.*, 713 F.2d 782, 218 USPQ 698 (Fed. Cir. 1983)). No showing at all has been made that the invention recited in each of the independent claims as a

whole would have been obvious based on the three-way combination of Wood, Johnson and Wang. The Examiner has proffered only a series of individual advantages purportedly motivating the addition of each succeeding prior art reference. A cascading litany of references is properly motivated in the art, without looking in hindsight to Applicants' disclosure, only if the Examiner can show a motivation for the overall combination, not just for each succeeding combination.

Respectfully submitted,

/Steven R. Ormiston/

Steven R. Ormiston

Reg. No. 35,974

Phone:208-433-1991 x204

*Amendment for RCE*  
*Serial No. 10/081,484*  
*Attorney Docket No. 10007664-1*

10